

Exhibit A

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

AX WIRELESS LLC,

Plaintiff,

v.

DELL INC., et al.,

Defendant.

Civil Action No. 2:22-cv-277-RWS-RSP

JURY TRIAL DEMANDED

PLAINTIFF AX WIRELESS LLC'S DISCLOSURE OF MARCOS TZANNES

AX Wireless LLC submits this disclosure for Marcos Tzannes pursuant to Federal Rule of Civil Procedure 26(a)(2)(c). Although AX Wireless expects to call Mr. Tzannes as a fact witness at trial, AX Wireless provides the following expert disclosure in accordance with Federal Rule of Civil Procedure 26(a)(2)(c), as Mr. Tzannes has not been retained or specifically employed to provide expert testimony and his employment does not regularly involve the giving of expert testimony. Mr. Tzannes may provide testimony at trial regarding the following:

1. His educational and professional background, including his experience as founder of Applied Transforms and his Masters of Science in Electrical Engineering from the University of California, Berkley.
2. The work leading to the inventions of the Asserted Patents.
3. The problems the inventors were trying to solve and hurdles faced by the inventors.
4. Background concepts contained in the Asserted Patents, including the basics of OFDM-based WiFi standards that pre-dated the effective filing date of the Asserted Patents.
5. The novel and nonobvious features of the Asserted Patents over the prior art.
6. The written description support for the claimed inventions.

7. His opinion that the 802.11ax standard practices the claims of the Asserted Patents.
8. His opinion that the asserted claims of the Asserted Patents are valid over the prior art and because they are sufficiently supported and enabled by their written description.
9. The benefits of the Asserted Patents and the differences and benefits of the 802.11ax Standard over, for example, prior art 802.11 standards and how the Asserted Patents contribute to those benefits.

Dated: November 16, 2023

Respectfully submitted,

/s/ Kevin C. Wheeler

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